

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

July 25, 2007

L. Brian Wolff, Treasurer
 Democratic Congressional Campaign
 Committee
 430 South Capitol Street SE, 2nd Floor
 Washington, DC 20003

Response Due Date: August 24, 2007

Identification Number:

C00000935

Reference:

30-Day Post-General Report (10/19/06-11/27/06)

Dear Mr. Wolff:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

- -The beginning cash balance of this report should equal the ending balance of your 12-Day Pre-General Report (10/1/06-10/18/06). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.
- -Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).
- -Schedule A of your report discloses apparent earmarked contributions totaling \$2,104,587.40, with \$2,214,103.65 in corresponding entries on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount, see

attached reporting example. Please amend your report to clarify these discrepancies.

-Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please identify the original contributors for earmarked contributions made and disclosed on Schedule B.

-Schedule A supporting Line 11(a)(i) of your report discloses negative entries for the apparent refunds of contributions originally received by your committee. Please be advised that if your committee wrote a refund check from your account, this disbursement should be disclosed on Schedule B supporting Line 28(a) of the Detailed Summary Page. Negative entries on Schedule A should only be used to disclose voided checks that were not cashed or cleared by a bank. This method of reporting would clarify for the public record the total amount of receipts/disbursements and more accurately disclose the cash-on-hand amount. Please amend your report(s) to properly disclose this activity or provide clarifying information.

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.52(d)(1) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.52(d)(2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.52(d)(1))

-Schedule A supporting Line(s) 17 of your report discloses a receipt(s) from Federal candidate committee(s) which requires further clarification.

For example, if this activity represents a transfer of funds, please indicate "transfer" on Schedule A supporting Line 11(c) of your report. If this activity represents a reimbursement for services provided to this committee, please indicate this on Schedule A supporting Line 15 of your report. Please amend your report to clarify the type of activity this receipt(s) represents.

-Schedule A supporting Line 17 of your report discloses a payment from "American List Council, Inc." It appears this receipt was for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". The term "usual and normal charge" for goods is defined as the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.52(d)(1) and (2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be an in-kind contribution received by your committee from a corporation and is prohibited subject to the limits set forth at 2 U.S.C. §441b(a)

-Please clarify all expenditures made for "List Exchange" and "List Rental" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B supporting Line 21(b) of your report discloses payments made to credit card companies. Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.9(b) and clearly identify on the Schedule B, which credit card payment each memo entry relates to.

-Schedule B supporting Line 23 of your report discloses payments made to credit card companies. Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service <u>regardless of the amount</u>. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.3(b)(3)(v) and clearly identify on the Schedule B, which credit card payment each memo entry relates to.

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or concert, with, or at the request or suggestion of, any candidate or any authorized committee or agent of such committee. Please amend your Schedule E accordingly.

-Itemized independent expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule E of your report to clarify the following description(s): "Production." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

-The independent expenditure schedule (Schedule E) should disclose the following information: the name and mailing address of the payee, the purpose of the expenditure, the date of payment, the amount of payment, the name and office sought, state and district (if applicable) of the federal candidate, the calendar year-to-date, per election, for office sought total, the election designation, an indication of whether the candidate was supported or opposed and the signature of the treasurer. Please amend Schedule E by providing the election designation for expenditures on behalf of "Ciro D. Rodriguez" and "Henry Bonilla". 11 CFR §104.3(b)(3)(vii)

-Schedule E of your report indicates that your committee may have failed to file or timely file one or more of the required 24 hour notices regarding "last minute" independent expenditures (see attached charts). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The notice must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next

report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

-Your committee has filed 24 hour notices for independent expenditures (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour notices must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule E, supporting Line 24 of your report, discloses \$1,041,142.69 in independent expenditures which appear to have been distributed or publicly disseminated after the general election dates in the respective states. Please be advised that if the communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR 104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the primary dates.

-Itemized coordinated expenditures must include a brief statement or description of why the expenditures were made. Please amend Schedule F of your report to clarify the following description(s): "Production." For further guidance regarding acceptable purposes, please refer to 11 CFR §104.3(b)(3).

-Schedule F, supporting Line 25 of your report, discloses a coordinated expenditure(s) on behalf of "Lois Murphy" and "Phil Kellam", which appears to have been distributed or publicly disseminated after the general election date. Please be advised that if the communication is aired in one reporting period and the payment is made in a later reporting period, the coordinated expenditure should be reported as a memo entry on Schedule F when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the

coordinated expenditure is made, the report should show a payment on Schedule F and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the coordinated expenditures disclosed after the general election date.

-The limitation on making coordinated party expenditures on behalf of a House candidate in the State of Indiana for the 2006 general election is \$39,600.00. Your reports disclose coordinated party expenditures made on behalf of Julia Carson. Further, your report indicates that your committee has been designated by the "IN Democratic State Party" to make coordinated party expenditures against its limit. However, your committee and the "Indiana Democratic Congressional Victory Committee" have combined to make \$85,459.75 in coordinated party expenditures on behalf of this candidate, which appears to exceed the limitations under 2 U.S.C. §441a(d) (see attached).

If any apparently excessive expenditure in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration.

-Schedule E discloses independent expenditures on behalf of a federal candidate(s). Schedule B, supporting Line 23 of this report discloses in-kind contributions and Schedule F of this report discloses coordinated expenditures on behalf of the same candidate(s). Under 2 U.S.C. §431(17), an "independent expenditure" is defined as:

... an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate; and that is not made in concert or cooperation with or at the

request or suggestion of such candidate, the candidate's authorized committee, or their agents, or a political party committee or its agents.

Further, 11 CFR §109.21 outlines the factors which define a coordinated communication. Please verify that the independent expenditures made by your Committee in support of "Joe Courtney", "Melissa Bean", "Joe Donnelly", "Harry Mitchell", "Angela Veronica Paccione", "Chris Murphy", "Timothy Mahoney", "Ron Klein", "Bruce Braley", "Tessa Michelle Hafen", "Michael Angelo Arcuri", "Peter Welch", "Darcy Burner", "Baron Hill", "Patricia Madrid", "John J. Cranley", "Diane Farrell", "Paul W.Hodes", "Lois Murphy", "Ed Perlmutter", "Tammy Duckworth", "Kristen Gillibrand", "Mary Jo Kilroy", "Zachary Space", "Patrick Murphy", "Christopher Paul Carney", "Jerry McNerney", "Dan Seals", "Tim J. Walz", "Daniel Benjamin Maffei", "Jason Altmire" and "Phil Kellam" meet the definition of and were properly categorized as independent expenditures. If necessary, amend your reports to disclose the aforementioned transactions as in-kind contributions (Schedule B supporting Line 23 of the Detailed Summary Page) or coordinated expenditures (Schedule F supporting Line 25 of the Detailed Summary Page).

If the reclassification of these expenditures as in-kind contributions results in excessive contributions, the Commission recommends that you notify the candidate(s) and request a refund of the amount in excess of \$5,000 per election. If the reclassification of these expenditures as coordinated expenditures results in your committee exceeding the limitations under 2 U.S.C. §441a(d), the Commission recommends that you notify the candidate(s) and request a refund of the amount in excess of the expenditure limitation.

Please inform the Commission of any corrective action immediately in writing and provide a photocopy of your refund request(s) sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

-Schedule B supporting Line 23 of your report discloses in-kind contributions made to Federal Candidates for the 2006 General election However, these goods or services appear to have been provided after the General election date. Please be advised that if goods or services are provided to a candidate in one reporting period and the payment is made in a later reporting period, the in-kind contribution should be reported as a memo entry on Schedule B, supporting line 23, as well as a debt on

schedule D when the goods or services are provided. When the payment for the in-kind contribution is made, the report should show a payment to the vendor on Schedule B, supporting line 23.

Please provide further clarifying information regarding these in-kind contributions disclosed after the General election date and amend your report as appropriate.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,

Daniel T. Buckley

Campaign Finance Analyst Reports Analysis Division

Missing 24-Hour Notices

| Missing 24-Hour Notices Name of Payee | Date | Amount | Purpose | Candidate |
|---|------------|--------------|---------------|---------------------------------------|
| McMahon Squier and Associates | 10/23/2006 | \$22,827.00 | Production | Nancy Johnson |
| Great American Media | 10/30/2006 | \$125,550.00 | Media Buy | Timothy Mahoney |
| Great American Media | 10/30/2006 | \$125,550.00 | Media Buy | Joe Negron |
| Message Audience & Presentation, | | | _ | · · · · · · · · · · · · · · · · · · · |
| Inc.* | 10/31/2006 | \$9,360.00 | Mail Services | Chet Edwards |
| Message Audience & Presentation, Inc.* | 10/31/2006 | \$9,360.00 | Mail Services | Nichoas VanCampen Taylor |
| Groundswell Communications Inc | 11/1/2006 | \$4,453.80 | Phone Banking | Ron Klein |
| Groundswell Communications Inc | 11/1/2006 | \$3,276.70 | Phone Banking | Leonard Boswell |
| Groundswell Communications Inc | 11/1/2006 | \$14,172.90 | Phone Banking | Jim Marshafl |
| Groundswell Communications Inc | 11/1/2006 | \$6,134.40 | Phone Banking | Patricia Madrid |
| Groundswell Communications Inc | 11/1/2006 | \$5,035.40 | Phone Banking | Phil Kellam |
| McMahon Squier and Associates | 11/3/2006 | \$22,827.00 | Production | J.D. Hayworth |
| GMMB | 11/3/2006 | \$12,900.00 | Production | Rick Odonnell |
| McMahon Squier and Associates | 11/3/2006 | \$22,827.00 | Production | Robert Simmons |
| AKP | 11/3/2006 | \$11,990.35 | Production | Clay Shaw |
| McMahon Squier and Associates | 11/3/2006 | \$6,670.00 | Production | O. Maxie Burns |
| Murphy Putnam Shorr & Partners, LLC | 11/3/2006 | \$8,710.35 | Production | J. Christopher Chocola |
| AKP | 11/3/2006 | \$3,150.00 | Production | John Hostettler |
| GMMB | 11/3/2006 | \$5,212.50 | Production | Baron Hill |
| GMMB | 11/3/2006 | \$5,212.50 | Production | Mike Sodrel |
| Dixon / Davis Media Group, LLC | 11/3/2006 | \$9,650.00 | Production | Heather Wilson |
| McMahon Squier and Associates | 11/3/2006 | \$6,950.00 | Production | Raymond Meier |
| Murphy Putnam Shorr & Partners, LLC | 11/3/2006 | \$7,985.20 | Production | Deborah Pryce |
| Murphy Putnam Shorr & Partners, LLC | 11/3/2006 | \$8,528.95 | Production | Joy Padgett |
| Mack Crounse Group, LLC | 11/3/2006 | \$360.00 | Mail Services | Zachary Space |
| AKP | 11/3/2006 | \$14,840.35 | Production | Curtis Weldon |
| GMMB | 11/3/2006 | \$10,650.00 | Production | Donald Sherwood |
| Murphy Putnam Shorr & Partners, LLC | 11/3/2006 | \$8,421.95 | Production | Peter Welch |
| GMMB | 11/3/2006 | \$10,050.00 | Production | Dave Reichert |
| Dixon / Davis Media Group, LLC | 11/3/2006 | \$9,750.00 | Production | John Gard |
| Dixon / Davis Media Group, LLC | 11/3/2006 | \$3,500.00 | Production | John Gard |

^{*}Schedule E of your report discloses four payments of \$9,360 to "Message Audience & Presentation, Inc." on 10/31/06 on behalf of these candidates. However, a 24-Hour Notice filed on 11/01/06 only discloses two of these expenditures.

Late 24-Hour Notices

| Late 24-Hour Notices | | | | | |
|----------------------|------------|--------------|-----------|------------|------------------------|
| Name of Payee | Date | Amount | Purpose | Date Filed | Candidate |
| Great American Media | 10/20/2006 | \$427,535.00 | Media Buy | 10/24/2006 | J.D. Hayworth |
| Great American Media | 10/20/2006 | \$48,928.94 | Media Buy | 10/24/2006 | Jerry McNemey |
| Great American Media | 10/20/2006 | \$48,928.94 | Media Buy | 10/24/2006 | Richard Pombo |
| Great American Media | 10/20/2006 | \$21,115.71 | Media Buy | 10/24/2006 | Joe Courtney |
| Great American Media | 10/20/2006 | \$401,198.59 | Media Buy | 10/24/2006 | Robert Simmons |
| Great American Media | 10/20/2006 | \$205,463.25 | Media Buy | 10/24/2006 | Christopher Shays |
| Great American Media | 10/20/2006 | \$21,270.93 | Media Buy | 10/24/2006 | Chris Murphy |
| Great American Media | 10/20/2006 | \$404,147.67 | Media Buy | 10/24/2006 | Nancy Johnson |
| Great American Media | 10/20/2006 | \$200,949.75 | Media Buy | 10/24/2006 | Timothy Mahoney |
| Great American Media | 10/20/2006 | \$551,922.53 | Media Buy | 10/24/2006 | Claw Shaw |
| Great American Media | 10/20/2006 | \$12,811.68 | Media Buy | 10/24/2006 | Michael Allen Collins |
| Great American Media | 10/20/2006 | \$9,341.00 | Media Buy | 10/24/2006 | John Barrow |
| Great American Media | 10/20/2006 | \$174,707.24 | Media Buy | 10/24/2006 | O. Maxie Burns |
| Great American Media | 10/20/2006 | \$49,699.09 | Media Buy | 10/24/2006 | Bruce Braley |
| Great American Media | 10/20/2006 | \$305,294.38 | Media Buy | 10/24/2006 | Michael Louis Whalen |
| Great American Media | 10/20/2006 | \$134,646.70 | Media Buy | 10/24/2006 | Jeffery Lamberti |
| Great American Media | 10/20/2006 | \$720,446.43 | Media Buy | 10/24/2006 | Peter Roskam |
| Great American Media | 10/20/2006 | \$519,984.13 | Media Buy | 10/24/2006 | David McSweeney |
| Great American Media | 10/20/2006 | \$110,976.88 | Media Buy | 10/24/2006 | J. Christopher Chocola |
| Great American Media | 10/20/2006 | \$168,214.25 | Media Buy | 10/24/2006 | John Hostettler |
| Great American Media | 10/20/2006 | \$351,117.53 | Media Buy | 10/24/2006 | Mike Sodrel |
| Great American Media | 10/20/2006 | \$437,816.10 | Media Buy | 10/24/2006 | Geoffrey Davis |
| Great American Media | 10/20/2006 | \$123,255.33 | Media Buy | 10/24/2006 | Gilbert Gutknecht |
| Great American Media | 10/20/2006 | \$372,081.25 | Media Buy | 10/24/2006 | Michele M. Bachmann |
| Great American Media | 10/20/2006 | \$394,847.35 | Media Buy | 10/24/2006 | Heather Wilson |
| Great American Media | 10/20/2006 | \$177,401.13 | Media Buy | 10/24/2006 | Dean Heller |
| Great American Media | 10/20/2006 | \$134,106.50 | Media Buy | 10/24/2006 | John Sweeney |
| Great American Media | 10/20/2006 | \$256,832.73 | Media Buy | 10/24/2006 | Raymond Meier |
| Great American Media | 10/20/2006 | \$151,208.70 | Media Buy | 10/24/2006 | Thomas M. Reynolds |
| Great American Media | 10/20/2006 | \$6,694.72 | Media Buy | 10/24/2006 | John J. Cranley |
| Great American Media | 10/20/2006 | \$214,532.91 | Media Buy | 10/24/2006 | Steve Chabot |
| Great American Media | 10/20/2006 | \$230,572.90 | Media Buy | 10/24/2006 | Deborah Pryce |
| Great American Media | 10/20/2006 | \$446,072.00 | Media Buy | 10/24/2006 | Joy Padgett |
| Great American Media | 10/20/2006 | \$135,401.70 | Media Buy | 10/24/2006 | Melissa Hart |
| _ | | | | | Christopher Paul |
| Great American Media | 10/20/2006 | \$63,741.71 | Media Buy | 10/24/2006 | Carney |
| Great American Media | 10/20/2006 | \$115,812.40 | Media Buy | 10/24/2006 | Donald Sherwood |
| Great American Media | 10/20/2006 | \$158,101.00 | Media Buy | 10/24/2006 | Thelma Drake |
| Great American Media | 10/20/2006 | \$17,149.20 | Media Buy | 10/24/2006 | Thelma Drake |

Late 24-Hour Notices (continued)

| Late 24-Hour Notices (continued) | | | | | | |
|----------------------------------|------------|----------------|-----------|------------|-----------------------|--|
| Name of Payee | Date | Amount | Purpose | Date Filed | Candidate | |
| Great American Media | 10/20/2006 | \$68,473.13 | Media Buy | 10/24/2006 | Peter Welch | |
| Great American Media | 10/20/2006 | \$124,625.25 | Media Buy | 10/24/2006 | Cathy McMorris | |
| Great American Media | 10/20/2006 | \$493,215.20 | Media Buy | 10/24/2006 | Dave Reichert | |
| Great American Media | 10/20/2006 | \$148,697.45 | Media Buy | 10/24/2006 | John Gard | |
| Great American Media | 10/26/2006 | \$1,025,989.50 | Media Buy | 10/28/2006 | Christopher Shays | |
| Great American Media | 10/26/2006 | \$194,563.80 | Media Buy | 10/31/2006 | John Hostettler | |
| Great American Media | 10/26/2006 | \$156,612.00 | Media Buy | 10/28/2006 | Nancy E. Boyda | |
| Great American Media | 10/26/2006 | \$156,612.00 | Media Buy | 10/28/2006 | Jim Ryun | |
| Great American Media | 10/26/2006 | \$193,093.75 | Media Buy | 10/28/2006 | Ron Lewis | |
| Great American Media | 10/26/2006 | \$490,644.75 | Media Buy | 10/31/2006 | Paul W. Hodes | |
| Great American Media | 10/26/2006 | \$490,644.75 | Media Buy | 10/31/2006 | Charles F. Bass | |
| | | | | | Daniel Benjamin | |
| Great American Media | 10/26/2006 | \$91,558.50 | Media Buy | 10/31/2006 | Maffei | |
| Great American Media | 10/26/2006 | \$91,558.50 | Media Buy | 10/31/2006 | James T. Walsh | |
| Great American Media | 10/27/2006 | \$168,278.31 | Media Buy | 11/1/2006 | Harry Mitchell | |
| Great American Media | 10/27/2006 | \$504,834.94 | Media Buy | 11/1/2006 | J.D. Hayworth | |
| Great American Media | 10/27/2006 | \$49,568.53 | Media Buy | 11/1/2006 | Jerry McNerney | |
| Great American Media | 10/27/2006 | \$49,568.54 | Media Buy | 11/1/2006 | Richard Pombo | |
| Great American Media | 10/27/2006 | \$101,829.00 | Media Buy | 11/1/2006 | Ed Perlmutter | |
| Great American Media | 10/27/2006 | \$101,829.00 | Media Buy | 11/1/2006 | Rick Odonnell | |
| Great American Media | 10/27/2006 | \$179,361.09 | Media Buy | 11/1/2006 | Joe Courtney | |
| Great American Media | 10/27/2006 | \$298,935.14 | Media Buy | 11/1/2006 | Robert Simmons | |
| Great American Media | 10/27/2006 | \$177,274.98 | Media Buy | 11/1/2006 | Chris Murphy | |
| Great American Media | 10/27/2006 | \$295,458.30 | Media Buy | 11/1/2006 | Nancy Johnson | |
| Great American Media | 10/27/2006 | \$114,813.15 | Media Buy | 11/1/2006 | Timothy Mahoney | |
| Great American Media | 10/27/2006 | \$114,813.15 | Media Buy | 11/1/2006 | Joe Negron | |
| Great American Media | 10/27/2006 | \$615,488.53 | Media Buy | 11/1/2006 | Claw Shaw | |
| Great American Media | 10/27/2006 | \$12,811.68 | Media Buy | 11/1/2006 | Michael Allen Collins | |
| Great American Media | 10/27/2006 | \$13,156.34 | Media Buy | 11/1/2006 | John Barrow | |
| Great American Media | 10/27/2006 | \$161,244.15 | Media Buy | 11/1/2006 | O. Maxie Burns | |
| Great American Media | 10/27/2006 | \$173,626.28 | Media Buy | 11/1/2006 | Bruce Braley | |
| | | | | | Michael Louis | |
| Great American Media | 10/27/2006 | \$173,626.29 | Media Buy | 11/1/2006 | Whalen | |
| Great American Media | 10/27/2006 | \$143,841.20 | Media Buy | 11/1/2006 | Jeffery Lamberti | |
| Great American Media | 10/27/2006 | \$323,799.26 | Media Buy | 11/1/2006 | Tammy Duckworth | |
| Great American Media | 10/27/2006 | \$971,397.77 | Media Buy | 11/1/2006 | Peter Roskam | |
| Great American Media | 10/27/2006 | \$519,126.65 | Media Buy | 11/1/2006 | David McSweeney | |
| Great American Media | 10/27/2006 | \$114,868.35 | Media Buy | 11/1/2006 | J Christopher Chocola | |
| Great American Media | 10/27/2006 | \$87,496.88 | Media Buy | 11/1/2006 | Baron Hill | |
| Great American Media | 10/27/2006 | \$262,490.62 | Media Buy | 11/1/2006 | Mike Sodrel | |
| Great American Media | 10/27/2006 | \$212,019.00 | Media Buy | 11/1/2006 | Baron Hill | |

Late 24-hour Notices (continued)

| Late 24-hour Notices (continued) | | | | | | |
|----------------------------------|------------|--------------------|-----------|------------|---------------------------|--|
| Name of Payee | Date | Amount | Purpose | Date Filed | Candidate | |
| Great American Media | 10/27/2006 | \$636,056.99 | Media Buy | 11/1/2006 | Mike Sodrel | |
| Great American Media | 10/27/2006 | \$718,266.85 | Media Buy | 11/1/2006 | Geoffrey Davis | |
| Great American Media | 10/27/2006 | \$61,627.67 | Media Buy | 11/1/2006 | Tim J. Walz | |
| Great American Media | 10/27/2006 | \$61,627.66 | Media Buy | 11/1/2006 | Gilbert Gutknecht | |
| Great American Media | 10/27/2006 | \$399,239.25 | Media Buy | 11/1/2006 | Michele M. Bachmann | |
| Great American Media | 10/27/2006 | \$35,572.50 | Media Buy | 10/31/2006 | Paul W. Hodes | |
| Great American Media | 10/27/2006 | \$35,572.50 | Media Buy | 10/31/2006 | Charles F. Bass | |
| Great American Media | 10/27/2006 | \$404,781.85 | Media Buy | 11/1/2006 | Heather Wilson | |
| Great American Media | 10/27/2006 | \$176,892.38 | Media Buy | 11/1/2006 | Dean Heller | |
| Great American Media | 10/27/2006 | \$152,075.75 | Media Buy | 11/1/2006 | Tessa Michelle Hafen | |
| Great American Media | 10/27/2006 | \$152,075.75 | Media Buy | 11/1/2006 | John Porter | |
| Great American Media | 10/27/2006 | \$152,689.74 | Media Buy | 11/1/2006 | John Sweeney | |
| Great American Media | 10/27/2006 | \$106,593.30 | Media Buy | 11/1/2006 | Michael Angelo Arcuri | |
| Great American Media | 10/27/2006 | \$319,779.90 | Media Buy | 11/1/2006 | Raymond Meier | |
| Great American Media | 10/27/2006 | \$226,682.85 | Media Buy | 11/1/2006 | Thomas M. Reynolds | |
| Great American Media | 10/27/2006 | \$350,547.25 | Media Buy | 11/1/2006 | Steve Chabot | |
| Great American Media | 10/27/2006 | \$366,220.45 | Media Buy | 11/1/2006 | Deborah Pryce | |
| Great American Media | 10/27/2006 | \$628,269.25 | Media Buy | 11/1/2006 | Joy Padgett | |
| Great American Media | 10/27/2006 | \$68,320.76 | Media Buy | 11/1/2006 | Jason Altmire | |
| Great American Media | 10/27/2006 | \$68,320.77 | Media Buy | 11/1/2006 | Melissa Hart | |
| Great American Media | 10/27/2006 | \$177,083.61 | Media Buy | 11/1/2006 | Donald Sherwood | |
| Great American Media | 10/27/2006 | \$157,263.88 | Media Buy | 11/1/2006 | Thelma Drake | |
| Great American Media | 10/27/2006 | \$17,149.20 | Media Buy | 11/1/2006 | Thelma Drake | |
| Great American Media | 10/27/2006 | \$68,459.25 | Media Buy | 11/1/2006 | Peter Welch | |
| Great American Media | 10/27/2006 | \$124,870.38 | Media Buy | 11/1/2006 | Cathy McMorris | |
| Great American Media | 10/27/2006 | \$541,197.80 | Media Buy | 11/1/2006 | Dave Reichert | |
| Great American Media | 10/27/2006 | \$148,683.58 | Media Buy | 11/1/2006 | John Gard | |
| Great American Media | 10/30/2006 | \$311,493.75 | Media Buy | 11/1/2006 | Ann Northrop | |
| Great American Media | 10/30/2006 | \$66,285.75 | Media Buy | 11/1/2006 | Adrian Smith | |
| Great American Media | 10/30/2006 | \$43,971.75 | Media Buy | 11/1/2006 | Adrian Smith | |
| Great American Media | 10/30/2006 | \$52,805.56 | Media Buy | 11/1/2006 | Jason Altmire | |
| Great American Media | 10/30/2006 | \$52,805.57 | Media Buy | 11/1/2006 | Melissa Hart | |
| Great American Media | 10/30/2006 | \$101,750.00 | Media Buy | 11/1/2006 | Thelma Drake | |
| Great American Media | 10/30/2006 | \$99,254.63 | Media Buy | 11/1/2006 | Dave Reichert | |
| Great American Media | 11/1/2006 | \$24,930.98 | Media Buy | 11/3/2006 | Daniel Benjamin Maffei | |
| Great American Media | 11/1/2006 | \$24,930.97 | Media Buy | 11/3/2006 | James T. Walsh | |
| Great American Media | 11/2/2006 | \$79,550.00 | Media Buy | 11/4/2006 | Ron Lewis | |
| Great American Media | 11/2/2006 | \$19,672.50 | Media Buy | 11/4/2006 | Adrian Smith | |
| Great American Media | 11/27/2006 | \$77,138.07 | Media Buy | 11/29/2006 | Ciro D. Rodriguez | |
| Great American Media | 11/27/2006 | \$77,138.06 | Media Buy | 11/29/2006 | Henry Bonilla | |

Missing Schedule E

| Name of Payee | Date | Amount | Purpose | Candidate |
|----------------------------------|------------|--------------|---------------|-------------------|
| Message Audience & Presentation, | 1 | | | ' |
| Inc.* | 10/27/2006 | \$4,539.00 | Mail Services | Chet Edwards |
| Message Audience & Presentation, | | | | Nichoas VanCampen |
| Inc.* | 10/27/2006 | \$4,539.00 | Mail Services | Taylor |
| Great American Media | 10/30/2006 | \$156,612.00 | Media Buy | Nancy E. Boyda |
| Great American Media | 10/30/2006 | \$156,612.00 | Media Buy | Jim Ryun |
| Great American Media | 10/31/2006 | \$163,601.99 | Media Buy | Ed Perlmutter |
| Great American Media | 10/31/2006 | \$163,602.00 | Media Buy | Rick Odonnell |
| AKP Message & Media | 10/31/2006 | \$20,905.35 | Production | David McSweeney |
| Precision Communications, Inc. | 11/2/2006 | \$1,017.98 | Phone Banking | John J. Cranley |
| LSG Strategies | 11/2/2006 | \$291.15 | Phone Banking | Darcy Burner |
| LSG Strategies | 11/2/2006 | \$291.15 | Phone Banking | Dave Reichert |
| The Clinton Group, Inc. | 11/3/2006 | \$1,108.52 | Phone Banking | Tammy Duckworth |
| The Clinton Group, Inc. | 11/3/2006 | \$3,896.08 | Phone Banking | Zachary Space |
| The Clinton Group, Inc. | 11/3/2006 | \$2,837.94 | Phone Banking | Peter Welch |
| Groundswell Communications Inc | 11/4/2006 | \$10,000.00 | Phone Banking | Jim Marshall |
| The Clinton Group, Inc. | 11/4/2006 | \$4,870.10 | Phone Banking | Zachary Space |
| Groundswell Communications Inc | 11/4/2006 | \$10,000.00 | Phone Banking | Lois Murphy |
| Groundswell Communications Inc | 11/5/2006 | \$2,273.75 | Phone Banking | Ron Klein |
| Groundswell Communications Inc | 11/5/2006 | \$2,638.70 | Phone Banking | Leonard Boswell |
| Groundswell Communications Inc | 11/5/2006 | \$270.25 | Phone Banking | Melissa Bean |
| Groundswell Communications Inc | 11/5/2006 | \$2,779.55 | Phone Banking | Patricia Madrid |
| Groundswell Communications Inc | 11/5/2006 | \$2,638.70 | Phone Banking | Phil Kellam |

^{*24-}Hour Notices filed on 10/27/06 and 10/31/06 disclose four payments of \$4,539 to "Message Audience & Presentation, Inc." on 10/27/06 these candidates. However, Schedule E of your report only discloses two payments to this vendor for \$4,539 on 10/27/06.

Excessive Coordinated Expenditures

| Candidate Name | Date | Amount | Report | Committee |
|----------------|------------|-------------|--------------|----------------------------------|
| | | | 2006 30-Day | Indiana Democratic Congressional |
| Julia Carson | 10/26/2006 | \$6,999.75 | Post-General | Victory Committee |
| _ | | | 2006 30-Day | Democratic Congressional |
| Julia Carson | 10/30/2006 | \$16,640.00 | Post-General | Campaign Committee |
| | · | | 2006 30-Day | Democratic Congressional |
| Julia Carson | 10/31/2006 | \$60,000.00 | Post-General | Campaign Committee |
| | | | 2006 30-Day | Democratic Congressional |
| Julia Carson | 11/02/2006 | \$1,820.00 | Post-General | Campaign Committee |

